



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TM:AES  
F. #2013R01609

271 Cadman Plaza East  
Brooklyn, New York 11201

August 20, 2013

By Federal Express and ECF

Martin G. Goldberg  
672 Dogwood Avenue #183  
Franklin Square, NY 11010

Re: United States v. Paul Rivera  
Criminal Docket No. 13-149 (S-1) (KAM)

Dear Mr. Goldberg:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter additional discovery in the above-referenced matter. This letter is intended to supplement the government's discovery letters dated April 2, 2013 and May 17, 2013. Please consider this letter to be the government's request for reciprocal discovery.

On the enclosed CD marked TF MAFIA CD-1, please find copies of the following:

- A color photograph of co-defendant Michael Garrett, which is Bates numbered TFMAFIA 1.
- Arrest photographs of co-defendant Michael Garrett taken on June 13, 2013, which are Bates numbered TFMAFIA 2.
- A license plate scan for New York license plate FWH5874, which is Bates numbered TFMAFIA 3-40.
- Evidence logs and receipts for items seized from a vehicle operated by co-defendant Michael Garrett on September 1, 2010 in Warren County, New Jersey, which are Bates numbered TFMAFIA 41-44.

- Photographs of items seized from a vehicle operated by co-defendant Michael Garrett on September 1, 2010 in Warren County, New Jersey, which are Bates numbered TFMAFIA 45-47.
- Documents related to the indictment of co-defendant Michael Garrett in connection with his September 1, 2010 arrest in Warren County, New Jersey, which are Bates numbered TFMAFIA 48-58.
- Currency transaction reports and IRS form 8300s for TF Mafia Muzik and/or Michael Garrett, which are Bates numbered TFMAFIA 59-66.
- A report of examination for a Western Digital removable computer hard drive, bearing serial number wcapw2490179, which is dated December 18, 2012, and which is Bates numbered TFMAFIA 67-68.
- A report of examination for four cellular phones (a Blackberry Bold phone with MEID 268435459708171584; a T-Mobile phone with SIM Card; a Samsung phone with an 8 GB Micro SD Card; and an LG phone, model LS-670 Optimus with MEID 268435460009498747), which is dated August 23, 2012, and which is Bates numbered TFMAFIA 69-71.
- A laboratory report and related analysis dated October 7, 2010, which is Bates numbered TFMAFIA 72-130.

In addition, enclosed please find a CD labeled RIVERA CD-3, which contains copies of the following documents:

- A report from the Federal Bureau of Investigation ("FBI") containing statements of co-defendant Michael Garrett made on June 12, 1996, which is Bates numbered GARRETT 16-17.
- Emails sent and received by the defendant while an inmate at the Metropolitan Detention Center, which have been Bates numbered RIVERA 886-1574, as well as an list of the defendant's email contacts, which is Bates numbered RIVERA 1575-1577. Please be advised that the production RIVERA 886-1574 contains emails between the defendant and his attorney; a paralegal in our office that is unrelated to the above-captioned matter has removed these emails from the set that the government will review in connection with this matter.

Please be advised that the FBI has in its possession the following additional documents and objects, which will be made available for inspection at a mutually convenient time: (1) one T-Mobile phone with SIM Card, and (2) one Samsung phone with an 8 GB Micro SD Card. You may examine all of the physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time.

Please also be advised that the government intends to call a forensic chemist to testify as follows regarding the substances that were recovered from co-defendant Michael Garrett and/or the vehicle operated by co-defendant Michael Garrett on September 1, 2010: (1) the 506 multi-colored balloons in the vehicle, weighing approximately 45.18 grams, contained heroin; and (2) the blunt removed from the defendant, weighing approximately 5.72 grams, contained marijuana. The government also intends to call an expert on drug quantity, to testify that the quantity of heroin recovered in this case is consistent with distribution. It is anticipated that this witness may also testify about the value of the heroin.

If you have any questions about these materials, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Taryn Merkl  
Taryn A. Merkl  
Alixandra E. Smith  
Assistant U.S. Attorneys  
718-254-6064/6370

Enclosures (RIVERA CD-3, TF MAFIA CD-1)

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)